

EUDR Update from CEI-Bois

TDUK members are being advised to read the latest update from CEI Bois regarding the EU Deforestation Regulation (EUDR).

On 24 September, CEI-Bois and EOS attended the meeting of the Deforestation Platform and additionally, on 25 September, they participated in the first train-the-trainer session on the Information System (IS) of the EUDR. Below you can find a summary of the meetings:

The EUDR Information System

Note: *It is expected that user guidance for the Information System is being prepared by the European Commission and will be released in the coming days.*

- For companies who prefer to use the Information System manually, it is certainly possible and straightforward to do so, though very time-consuming when dealing with large volumes of information. In this case, however, having the geolocation information in [GEOJson format](#) (which is easy to upload in bulk) will help to speed up and simplify the process.
- Companies NOT placing commodities or products on the EU market for the first time will only have to refer to existing DDSs, therefore not needing to upload any geolocation information.
- Non-EU operators can have access to the Information System, including to submit DDSs, when exporting products to the EU, with some technical restrictions (for example, they can only select the activity type 'import', even when exporting to the EU). Such operators will also be offered dedicated training. However, non-EU operators must obtain the EORI number from the EU Member State into which they want to export for registration on the IS.
- The Information System will be open for operators to submit DDSs from 2 December 2024.
- Regarding the validity of DDSs, CEI-Bois understands that non-active DDSs, including submitted ones, will be archived for five years. While not visible on the main screen of the IS, archived DDSs can be found using the advanced search function. The current five-year timeframe was set in order to have a clearly defined end date in order to comply with the GDPR. The EU Commission is evaluating how to extend this validity.

- Regarding the DDSs validation after submission, unfortunately there is no clear timeframe within which it must happen, but it is not expected to take more than 24 hours. It depends mainly on the automated risk assessment conducted by the CAs in the background once a DDS is submitted. If the submitted DDS happens to include information about production areas previously flagged by the CAs internally as risky, then this will trigger the risk assessment. As a recommendation, operators will need to directly contact the CAs if they see that their DDS is not validated after three hours.
- Moreover, a DDS should generally be submitted prior to the product's placement on the market. It does not precisely matter when, but it is recommended as soon as the operator receives the necessary information from the supplier.
- Regarding the number of reference numbers of upstream DDSs supported for each new DDS, it is CEI-Bois' understanding that each DDS will be able to reference a maximum of 2,000 (the reference numbers of the DDSs submitted by direct suppliers, not indirect suppliers). However, according to preliminary information to be included in the updated FAQ, operators will be able to submit one DDS for multiple shipments, thereby significantly reducing the overall number of DDSs in circulation. This will also reduce the number of upstream DDS reference numbers which need to be referred. It is also worth noting that the Information System allows downstream operators to manually add the reference numbers they want to refer to or to upload them in bulk (as CSV file).
- CEI-Bois also believes that each new DDS can cover up to 100 commodities (a maximum number of 1,000 production places per commodity), and up to 10,000 production places per DDS. Notably, each production place can consist of multiple polygons. Indeed, per DDS, a maximum of 25MB of geolocation data can be uploaded. 'Production place' means the country of production of the raw commodity.
- It has also been re-confirmed that upstream operators can block geolocation information from being seen by downstream operators by clicking a specific button in the IS when submitting a DDS. This will not obstruct downstream operators from submitting their own EUDR-compliant DDSs (even if they cannot see the geolocation information in the DDSs they will refer to).
- Additional training will be provided directly to operators in a month in hybrid format. Webinars will also be made available. Informative videos on the Information System [have been uploaded on the Commission's dedicated website](#).

- Work on the EUDR guidance and on the updated FAQ guidance is ongoing but is awaiting political validation within the Commission. Both the guidance and the FAQ will cover a variety of other topics, such as the frequency of the submission of DDSs. As mentioned above, according to preliminary information to be included in the updated FAQ, operators will be able to submit one DDS for multiple shipments if due diligence was exercised. The ‘ascertainment’ of upstream DDSs topic will also be covered, although no precise measures are expected to be prescribed. Moreover, a separate document clarifying the simplifications envisaged for SMEs has been announced.
- No updates have been provided on the country risk benchmarking. It has only been re-confirmed that the benchmarking will be made available for all countries at the same time (with no publication priority given to low-risk countries). Also, there will not be a public consultation during the benchmarking exercise. Transparency on the process will simply mean that the Commission will provide information on the methodology when developed.

Finally, please be informed that, on 25 September, CEI-Bois and EOS, alongside other organisations representing European primary producers and various industries in the scope of the EUDR, issued a joint statement that [“With less than 100 days left and no clear implementation tools, European primary producers and various industries urge a delay of the entry into application of the EUDR”](#).